

RENE L. VALLADARES
Federal Public Defender
State Bar No. 11479
SHARI L. KAUFMAN
Assistant Federal Public Defender
411 E. Bonneville Ave., Suite 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax

Counsel for Becky Lea Pringle

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
BECKY LEA PRINGLE
Defendant.

2:05-CR-169-RCJ-LRL

**UNOPPOSED MOTION FOR EARLY
TERMINATION OF SUPERVISED
RELEASE**

COMES NOW the defendant, Becky Lea Pringle, by and through her attorney of record, Assistant Federal Public Defender, Shari L. Kaufman, and submits this unopposed request for early termination of supervision.

DATED this 11th day of June, 2014.

RENE L. VALLADARES
Federal Public Defender

/s/ SHARI L. KAUFMAN

SHARI L. KAUFMAN
Assistant Federal Public Defender

STATEMENT OF FACTS

Becky Lea Pringle (hereinafter “Ms. Pringle”) was indicted on May 17, 2005 in a three-count Criminal Indictment charging her with violations of 21 U.S.C. § 841 (a)(1), (b)(1)(A)(viii) and (b)(1)(B)(viii) - Distribution of a Controlled Substance. (Dkt. 1). On August 3, 2005 Ms. Pringle pleaded guilty to Count Two of the Criminal Indictment pursuant to a plea agreement. (Dkt. 23). On March 6, 2006 Ms. Pringle was sentenced as to Count Two to 70 months in the custody of the BOP followed by five years of supervised release. (Dkt. 41). Counts One and Three were dismissed on the motion of the government. Id. The term of five years of supervision commenced on March 19, 2010.

ARGUMENT

Ms. Pringle has been on supervision 50 months (four fifths of her term) and has completed all conditions of her supervision. Ms. Pringle has not had any violations, new charges or any other sort of problem with her supervision. Ms. Pringle now moves to terminate her supervision early.

Ms. Pringle's Probation Officer, Eric Christiansen, indicates that she has complied with all the conditions of her supervised release. Further he indicates that she has passed 36 out of 36 drug tests during her period of supervision. At this time, Ms. Pringle is not receiving any more services from probation and has no outstanding requirements of supervision to fulfill

Pursuant to 18 U.S.C. §3583(e)(1), the Court may, after considering the factors set forth in section 3553(a)(1), (a)(2)(b), (a)(2)(C), (a)(2)(D), (a)(4), (a)(6), and (a)(7). -- terminate a term of supervised release and discharge the defendant at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant and the interest of justice.

Ms. Pringle is statutorily eligible for early termination: she has been on supervision for over four years. See 18 U.S.C. § 3583(e)(1) (the court may terminate supervision after the expiration of one year). There are no negative factors that weigh against granting the relief requested.

Early termination of Ms. Pringle's supervision is warranted by her conduct and it is in the interest of justice. Since starting supervision, Ms. Pringle has been a stable and contributing member

1 of her community and family.

2 Ms. Pringle has not experienced any events or circumstances which would create a risk or
3 would require further supervision. Thus, further supervision is unnecessary and early termination
4 is warranted.

5 Accordingly, Ms. Pringle respectfully requests that the Court terminate the remainder of her
6 supervision. Assistant United States Attorney Pamela Martin and Eric Christiansen, Ms. Pringle's
7 supervising probation officer, do not oppose this request.

8 DATED this 11th day of June, 2014.

9 Respectfully submitted,

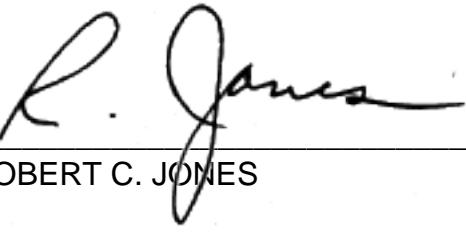
10 RENE L. VALLADARES
Federal Public Defender

11 */s/ SHARI L. KAUFMAN*

12 SHARI L. KAUFMAN
13 Assistant Federal Public Defender
14 Counsel for Becky Lea Pringle

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17 IT IS SO ORDERED this 3rd day of July, 2014.

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21 ROBERT C. JONES
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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Office of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on June 11, 2014, she served an electronic copy of the above and foregoing

UNOPPOSED MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE,

by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
PAMELA MARTIN
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

Via Electronic Mail to:

UNITED STATES PROBATION
ERIC CHRISTIANSEN
United States Probation Officer

/s/ Nancy Vasquez

Employee of the Federal Public Defender